

)
)
)
)
)
)
)
)
)
)

Case No 2:21-cv-00300-MHH

DEFENDANTS' EVIDENTIARY SUBMISSION
IN SUPPORT OF SUMMARY JUDGMENT

Defendants CRC Insurance Services, Inc., Truist Financial Corp., and Truist

Bank file the following evidentiary submission in support of summary judgment:

1. Deposition Transcript of Rusty Hughes
2. Declaration of Corey Daugherty
3. Deposition Transcript of Corey Daugherty
4. Documents Produced by Plaintiff and Defendants (organized by bates number)
5. Deposition Transcript of Stephanie Petty

6. Deposition Transcript of Kathryn Hendrix
7. Deposition Transcript of Ron Helveston
8. Declaration of Lee McClure
9. Deposition Transcript of Clay Segrest
10. Declaration of Clay Segrest
11. Deposition Transcript of Susan Philips
12. Declaration of Ross Robertson
13. Declaration of Jonathan Morgan
14. Declaration of Rusty Hughes
15. Declaration of Brandi Russell
16. Declaration of Amber Varner
17. Declaration of Corey Woodward
18. Declaration of Andrea Sutton
19. Declaration of Yvette Talsma

20. Pay Chart and Pay Data Filed Under Seal
21. Deposition Transcript of John Cadden
22. Plaintiff's Mental Health Records File Under Seal
23. October 8, 2019 Letter from Hendrix's Attorney
24. November 14, 2019 Letter from BB&T Counsel
25. Plaintiff's Supplemental Discovery Responses

Respectfully submitted this the 30th day of May, 2024.

/s/ Rachel V. Barlotta
RACHEL V. BARLOTTA
KAYLA M. WUNDERLICH
Attorneys for Defendants

OF COUNSEL:

BAKER DONELSON BEARMAN
CALDWELL & BERKOWITZ, P.C.
1901 Sixth Avenue North, Suite 2600
Birmingham, AL 35203
(205) 328-0480 Telephone
(205) 322-8007 Facsimile
rbarlotta@bakerdonelson.com
kwunderlich@bakerdonelson.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a true and accurate copy of the foregoing by filing the same via the court filing system and/or via electronic or U.S. Mail, first-class postage pre-paid, on all counsel of record on May 30, 2024.

Leslie Palmer
Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, Alabama 35233
Tel: (205) 285-3050
leslie@palmerlegalservices.com

Cynthia F. Wilkinson
Wilkinson Law Firm
1717 3rd Avenue North, Suite A
Birmingham, Alabama 35203
wilkinsonefile@wilkinsonfirm.net

Patricia A. Gill
Barrett & Farahany
2 20th Street N, #900
Birmingham, AL 35203
trish@justiceatwork.com
Tel: (205) 390-1953

/s/ Rachel V. Barlotta

Of Counsel